

FILED

APR 14 2010

**SECRETARY, BOARD OF
OIL, GAS & MINING**

**BEFORE THE BOARD OF OIL, GAS AND MINING
DEPARTMENT OF NATURAL RESOURCES
STATE OF UTAH**

IN THE MATTER OF THE REQUEST FOR AGENCY ACTION OF ANADARKO PETROLEUM CORPORATION FOR AN ORDER MODIFYING THE BOARD'S ORDER IN CAUSE NO. 241-1 TO ALLOW AN ADDITIONAL (SECOND) WELL IN EACH OF THE 160-ACRE (OR SUBSTANTIALLY EQUIVALENT) DRILLING UNITS FOR THE PRODUCTION OF GAS (INCLUDING COALBED METHANE) FROM THE FERRON FORMATION IN SECTIONS 32 AND 36, TOWNSHIP 13 SOUTH, RANGE 10 EAST, SLM, AND SECTIONS 2 THROUGH 4, TOWNSHIP 14 SOUTH, RANGE 10 EAST, SLM, CARBON COUNTY, UTAH

**MOTION FOR LEAVE TO FILE
SUPPLEMENTAL EXHIBITS**

Docket No. 2010-012

Cause No. 241-01A

COMES NOW, Anadarko Petroleum Company ("Anadarko"), by and through its attorneys, Beatty & Wozniak, P.C., and pursuant to Utah Admin. Code Rule R641-105-300, and hereby requests the Board of Oil, Gas and Mining (the "Board") for leave to file the following exhibits supplementing those already on file in this cause:

SUPPLEMENTAL EXHIBIT "A-2" – Resume of Andrew W. Taylor – Geologist (4 pages – attached hereto)

SUPPLEMENT TO EXHIBIT "F" – True and correct copies of return receipts, of mailings returned as undeliverable, and of USPS status inquiries (relating to mailings for which no status had been determined) received after the original exhibit filing deadline (February 22, 2010) (6 pages – filed with the Board on March 23, 2010)

SUPPLEMENTAL EXHIBIT “G-2” – Ferron Gross Coal Isopach for Helper Field with added thicknesses and spotlighting the location of example well (1 page – filed with Board on March 23, 2010)

SUPPLEMENTAL EXHIBIT “I-2” – Ferron Net Sand Isopach for Helper Field with added thicknesses and spotlighting the location of example well (1 page – filed with Board on March 23, 2010)

Supplemental Exhibit “A-2” is required because, due to the continuation of this matter from the March 24, 2010 docket and prior commitments, Mr. Will Monn will be unable to testify at the April 28, 2010 hearing; Mr. Taylor will be testifying in his stead. The need for the supplement to Exhibit “G” is self-explanatory and this type of supplement has previously been regularly accepted by the Board. Supplemental Exhibits “G-2” and “I-2” were prepared and submitted in response to a request contained in the Staff Memorandum dated March 10, 2010 in this Cause filed by the Utah Division of Oil, Gas and Mining (the “Division”).

Exhibits filed later than 30 days before the scheduled hearing date may be allowed by the Board upon good cause shown (*see* Utah Admin. Code Rule R641-105-500). The hearing on this matter is scheduled for April 28, 2010. Anadarko and the Division are the only parties to this Cause (no other party having filed a timely response to the request), and these supplements do not materially change any of the previously filed exhibits. As a

consequence, and for the reasons outlined above, Anadarko respectfully requests this Motion for Leave be granted.

Respectfully submitted this 14th day of April, 2010.

BEATTY & WOZNIAK, P.C.

By: 

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Attorneys for Petitioner Anadarko Petroleum Corporation

CERTIFICATE OF SERVICE

I hereby certify that, on this 14th day of April, 2010, I caused a true and correct copy of the foregoing Motion for Leave to File Supplemental Exhibits to be hand and electronically delivered to the following:

Michael S. Johnson, Esq.
Assistant Attorney General
Attorney for Board of Oil, Gas and Mining
1594 West North Temple, Suite 300
Salt Lake City, Utah 84116
MikeJohnson@utah.gov

Steven F. Alder, Esq.
Assistant Attorney General
Attorney for Division of Oil, Gas and Mining
1594 West North Temple, Suite 300
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Gil Hunt
Associate Director, Oil & Gas
Utah Division of Oil, Gas and Mining
1594 West North Temple, Suite 1210
Salt Lake City, UT 84116
GilHunt@utah.gov

A handwritten signature in cursive script, appearing to read "Gil Hunt", written over a horizontal line.

Andrew W. Taylor

3043 Spearwood Drive
Highlands Ranch, CO 80126
Home Phone: (303) 284-8155
Cellular Phone: (720) 256-1333
E-mail: andrewwtaylor77@yahoo.com

PROFESSIONAL GEOLOGIC EMPLOYMENT:

Anadarko Petroleum Corporation

- **Geoscience Manager, Rockies Coalbed Methane (2010-present)**
Geoscience manager responsible for technical projects and staff development of 4 geologists and 2 technologists, working coalbed methane assets in Wyoming (Powder River Basin and Atlantic Rim) and Utah (Cardinal Draw, Helper and Clawson Fields) / work with management team to set asset goals and allocate resources accordingly / review technical merits and feasibility of potential future coalbed methane opportunities / research and implement new coalbed methane technologies and/or techniques
- **Team Lead, Coalbed Methane, Southern Powder River Basin, Wyoming (2009-2010)**
Led multi-disciplinary team responsible for 4 field areas in the PRB CBM asset / participated in regulatory affairs, from POD review and submittal to field onsites with the BLM / team booked 11 MMBOE proved reserves / team executed on several projects that included drilling, completions, workovers, construction, and water & gas infrastructure for hundreds of wells / helped manage capital and LOE projects / tracked KPIs and financial data / led effort to form team and commence execution on multi-year P&A program for late-in-life CBM field
- **Senior Geologist, Coalbed Methane, Powder River Basin, Wyoming (2007-2009)**
Subsurface mapping of Fort Union coals / oversee geologic portion of multiple rig program (~500 wells/yr) / responsible for recommending core acquisition and reservoir pressure data to monitor gas content and CDP / involved with budget process and reserves management / collaboration with reservoir, land, regulatory, permitting, water management and field operations on a daily basis
- **Senior Geologist, Enhanced Oil Recovery, Salt Creek Field, Natrona Co., Wyoming (2006-2007)**
Subsurface mapping and reservoir characterization of 9 productive horizons / provide geologic guidance for planning and surveillance of CO₂ operations (major horizons) and waterflood optimization (minor horizons)
- **Geologist, Enhanced Oil Recovery, Lynch Area (Johnson Co., Wyoming) (2005-2006)**

Subsurface mapping and reservoir characterization of 4 productive horizons / assisted geophysicist in building updated structural interpretation utilizing new 3-D survey / identified bypassed fault blocks for primary drilling / assisted with efforts to increase field production volumes

- **Geologist, Permian Basin, Ozona Field, Crockett County, Texas (2002-2005)**
Mapped productive Pennsylvanian and Permian intervals (clastic and carbonate) / proposed and maintained ~150 well drilling inventory / served as the geologic expert for a successful field rule change hearing / appointed Team Lead for last six months in group (coordinated drilling activities between land, reservoir, marketing, drilling and regulatory)
- **Campus Recruiting**
Lead Recruiter: Utah State University / BYU (2007-present)
Lead Recruiter: AAPG Student Expo, Houston (2006)
Junior Recruiter for Utah State, BYU, and University of Utah (2004-2005)
- **Geologic Intern Committee (2003-2006)**
Led efforts to identify projects, organize summer activities, track program budget, mentor and evaluate interns / worked with management and HR to implement similar programs in other disciplines / made hiring recommendations to management for over 50 interns
- **Exploration Geologist Intern, East Texas Basin (2001)**
Geologic study of the Sugar Creek Field and surrounding areas, with emphasis on the Upper Cretaceous Woodbine Formation / constructed geologic model that was utilized to high-grade and/or down-grade pre-existing Woodbine leads and prospects

STUDENT GEOLOGIC EMPLOYMENT:

- Utah State University, Department of Geology, Logan, UT, Teaching Assistant (Fall 2000), Research Assistant (Fall 2000-May 2002)
- United States Geological Survey, Water Resource Division, Iowa City, IA, Sediment Lab Technician (July 1999-May 2000)

EDUCATION:

- Utah State University, MS-Geology, December 2002 (GPA= 4.0/4.0)
- The University of Iowa, BS-Geology with Highest Distinction and Honors, July 2000 (GPA= 4.0/4.0)
- Illinois Central College, Associate in Arts and Science, December 1997 (GPA= 3.95/4.0)

INDUSTRY TRAINING:

- Anadarko New Hire Training Program, 15 course curriculum (2002-2005)
- Anadarko Leadership Academy
- Economic Evaluation & Investment Decisions, Stermole
- Exploration Economics, Risk Analysis & Prospect Evaluation, Rose and Associates

- Geostatistics and Reservoir Characterization
- Stimulations and Completions for Geologists
- Statistics for Petroleum Engineers and Geologists
- Applied Subsurface Geological Mapping
- Reservoir Sedimentology & Stratigraphy of Continental Clastic Systems (Wyoming)
- Recent Depositional & Stratigraphic Analogues for Fluvial & Shallow Marine Reservoirs (South Carolina)

SOFTWARE:

- GeoGraphix
- Petra, GeoPlus Corporation
- PI/Dwights Database, IHS Energy
- SmartSection
- Microsoft Office Suite

ACADEMIC RESEARCH:

- (2000-2002) Utah State University, Masters Thesis: Sedimentology, facies analysis, and reservoir characterization of lacustrine rocks, Eocene Green River and Colton Formations, Uinta Basin, Utah
- (1998-2000) The University of Iowa, Undergraduate Honors Thesis: Analysis and correlation of carbon isotope excursions in early Mississippian sections of Nevada, Utah, and Iowa: Relating global carbon isotope perturbations to tectonic activity

GRANTS/RESEARCH AWARDS:

- Utah State University, Department of Geology, Outstanding Graduate Student Researcher (April 2002)
- American Association of Petroleum Geologists, Grants-in-Aid, Gustavus E. Archie Memorial Grant (May 2001)
- The Rocky Mountain Association of Geologists, Norman H. Foster Memorial Scholarship Award (May 2001)
- Geological Society of America Graduate, Student Research Grant (May 2001)

ACADEMIC AWARDS:

- Phi Beta Kappa, University of Iowa (November 1999)
- L. Austin Weeks Undergraduate Award, American Association of Petroleum Geologists (February 2000)
- College of Liberal Arts and Science Collegiate Scholar Award, University of Iowa (May 2000)
- Sigma Gamma Epsilon W.A. Tarr Award (May 2000)
- Top Field Camp Student, Wasatch-Uinta Big Ten Field Camp (August 2000)
- Cedar Valley Rock and Mineral Society Scholarship (October 2000)

PUBLICATIONS:

- Taylor, Andrew W., and Ritts, Bradley D., 2004, Sedimentology, facies architecture,

and reservoir characterization of lacustrine rocks, Eocene Green River and Colton Formations, Uinta Basin, Utah, *Journal of Petroleum Geology*, v. 27, p. 3-26.

- Moore Ali-Adeeb, J., Taylor, A., Johnson, C., Ritts, B.D., and Archer, R., *in press*, Facies analysis, reservoir characterization and lidar modeling of an Eocene lacustrine delta, Green River Formation, southwest Uinta Basin, Utah, In: Sandstones in Lacustrine Depositional Settings, Y. Bartov and D. Nummedal, eds., AAPG Memoir.
- Archer, R., Robbana, E., Ritts, B.D., Moore Ali-Adeeb, J., Johnson, C., and Taylor, A., *in review*, Reservoir simulation models of an Eocene lacustrine delta, Green River Formation, SE Uinta Basin, Utah, In: Sandstones in Lacustrine Depositional Settings, Y. Bartov and D. Nummedal, eds., AAPG Memoir.

ABSTRACTS:

- Taylor, A.W., and Ritts, B.D., 2002, Detailed facies architecture, sedimentology, and reservoir characterization of lacustrine rocks, Eocene Green River and Colton Formations, Uinta Basin, Utah. 2002 AAPG Annual Meeting.
- Taylor, A.W., and Saltzman, M.R., 2000, Analysis and correlation of carbon isotope excursions in the early Mississippian: Evidence for a synchronous oceanographic event in North America (Presentation of further research), *Geological Society of America Abstracts with Programs*, v. 32, no. 7, p. A-311.
- Taylor, A.W., and Saltzman, M.R., 2000, Analysis and correlation of carbon isotope excursions in the early Mississippian: Evidence for a synchronous oceanographic event in North America, *Geological Society of America Abstracts with Programs*, v. 32, no. 4, p. A-64.

ELECTED OFFICES HELD:

- The University of Iowa Department of Geoscience Undergraduate Representative (1999-2000)
- Secretary for The University of Iowa Student Chapter of A.A.P.G. (1999-2000)

COMMITTEE POSITIONS:

- Utah State University Department of Geology External Advisory Board (2007-present)
- AAPG Student Chapters Committee (2006-2009)

PROFESSIONAL AFFILIATIONS:

- American Association of Petroleum Geologists
- Rocky Mountain Association of Geologists
- Houston Geological Society

REFERENCES:

Available upon request